

### **REMARKS/ARGUMENTS**

The office action of April 6, 2004 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 7-9 and 22-24 remain pending in this application. Claims 1-6, 10-21 and 25-31 have been canceled without prejudice or disclaimer and new claims 32-58 have been added.

The specification has been objected to for a minor informality which has been attended to by the above amendment to the abstract of the disclosure. Also, minor informalities discovered during a review of the specification have been corrected.

Claims 1-6, 16-21 and 31 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. patent no. 5,966,715 to Sweeney et al. ("Sweeney"). Applicants respectfully traverse this rejection. Nonetheless, these claims have been canceled without prejudice or disclaimer and thus this rejection is deemed moot.

Claims 7-9 and 22-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweeney, further in view of U.S. patent no. 5,335,320 to Iwata et al. ("Iwata") and U.S. patent no. 5,874,955 to Rogowitz et al. ("Rogowitz"). Applicants respectfully traverse this rejection.

The action alleges that Sweeney at col. 5, lines 10-35 discloses receiving an object and the object being modified. However, the action acknowledges that Sweeney fails to teach or suggest assigning a new unique identifier to an object and updating the metadata and history. To overcome these deficiencies, the action points to Iwata and Rogowitz. Specifically, the action alleges that Iwata, col. 8, lines 55-67, describes setting a new unique identifier for an object and that Rogowitz, col. 20, lines 55-65, describes updating the metadata and history as recited in claim 7.

As amended, claim 7 calls for a method for synchronizing multiple versions of an object including receiving a multimedia object having an associated unique identifier, metadata and history; assigning a new unique identifier to the multimedia object responsive to the multimedia object being modified; and updating the metadata and history of the multimedia object to include a node corresponding to the new unique identifier and a vector describing, via the metadata, the modification performed to arrive at the multimedia object corresponding to the new unique identifier. Several differences exist between amended claim 7 and the combination of Sweeney,

Iwata and Rogowitz. For example, the combination of Sweeney, Iwata, and Rogowitz does not teach or suggest applying any of the steps claimed to a *multimedia* object as recited in claim 7. Sweeney is directed to a user management system, which allows permissive access to applications and databases for individual or groups of users. The cited portion of Sweeney merely describes a user administration process in which a new user is added to an existing group. Nothing in the cited portion of Sweeney or elsewhere even remotely contemplates a multimedia object. Iwata relates to editing a GUI including adding a GUI element to GUI data and does not relate in any way to a multimedia object. Furthermore, Rogowitz discloses an interactive rule based system and describes a ruled based architecture for PRAVDA where scientific or engineering based data is introduced absent a teaching or suggestion of multimedia objects.

Also, applicants assert that Iwata fails to provide a teaching or suggestion of assigning a new unique identifier to a *multimedia object responsive to the multimedia object being modified* as claimed in claim 7. According to the method described in Iwata, when an Add command is received, the edit manager adds the information of the GUI element to be added to the edit data and sets a unique identifier for the GUI element to be added which is different from the unique identifiers of the existing GUI elements. Applicants acknowledge that Iwata sets a unique identifier to each GUI element added to the edit data. Yet merely adding a new GUI element and assigning the new element a unique identifier does not provide a teaching or suggestion of assigning a new unique identifier to a multimedia object *responsive to the multimedia object being modified* as recited in claim 7. Thus, for this additional reason the combination of Sweeney, Iwata and Rogowitz, even if proper, does not result in the claim 7 combination of features.

Moreover, contrary to the action's assertion Rogowitz neither teaches nor suggests updating the metadata and history of the multimedia object to include a node corresponding to the new unique identifier and a vector describing, via the metadata, the modification performed to arrive at the multimedia object corresponding to the new unique identifier. The cited portion of Rogowitz merely discloses that the introduction of a new operation on the data (ozone data in the example described) may result in a change to the metadata associated with the data. As described, "the introduction of a new operation 435 that computes the magnitude of a vector

field, would change the relevant metadata.” Col. 20, lines 59-63. Thus, at most Rogowitz describes that the metadata may change. Notwithstanding, Rogowitz does not teach or suggest updating the metadata and history of the multimedia object to include a node corresponding to the new unique identifier and a vector describing, via the metadata, the modification performed to arrive at the multimedia object corresponding to the new unique identifier as recited in claim 7. For this further reason, the combination of Sweeney, Iwata and Rogowitz, even if proper, does not result in the invention of claim 7.

Claim 22 is directed to a computer-readable medium having computer-executable instructions for performing the same steps as recited in the method of claim 7. Thus, claim 22 is patentably distinguishable over the applied combination for the same reasons as claim 7. Claims 8 and 9, which ultimately depend from claim 7, and claims 23 and 24, which ultimately depend from claim 22, are patentably distinct from the combination of Sweeney, Iwata and Rogowitz for the same reasons set forth with respect to their ultimate base claim and further in view of the novel and non-obvious features recited therein.

Claims 10-13 and 25-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweeney, further in view of Iwata. Claims 14 and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweeney, further in view of U.S. patent no. 6,044,375 to Shumueli et al. (“Shumueli”). Claims 15 and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweeney, further in view of Shumueli and U.S. patent no. 5,502,733 to Kishi et al. (“Kishi”). Applicants respectfully traverse these rejections. Nonetheless, these claims have been canceled without prejudice or disclaimer and thus these rejections are deemed moot.

New claims 32-58 are fully supported by the specification and believed allowable over the art of record.

### **CONCLUSION**

A Fee Transmittal is attached. If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

Appln. No.: 09/809,058  
Amendment dated June 25, 2004  
Reply to Office Action of April 6, 2004

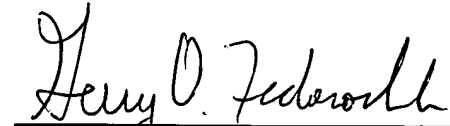
All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

BANNER & WITCOFF, LTD.

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